PAPA, DePAOLA and BROUNSTEIN

Attorneys at Law

42-40 Bell Boulevard Bayside, New York 11361 Suite 500

John P. Papa John R. DePaola Steven L. Brounstein (718) 281-4000 FAX (718) 281-4030

Madeline Wrzesc Legal Assistant

John K. Kouroupas Lawrence E. Kozar

VIA ECF

August 10, 2011

Honorable Ramon Reyes United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: <u>United States v. Anthony Colandra</u>

10 Cr. 1008(BMC)

Dear Judge Reyes:

I represent Mr. Colandra. Mr. Colandra's bail condition include home detention with electronic monitoring while allowing home to go to work. Mr. Colandra's daughter will be attending SUNY Plattsburgh located at 101 Broad st., Plattsburgh, New York. She needs to be present at school by 8:00 A.M. on August 27th. I am respectfully requesting that Mr. Colandra be given permission to accompany his daughter to the school in order to aid her in moving into her college residence. Plattsburgh is approximately an eight hour drive from New York City. Mr,. Colandra presence is particularly important in moving his daughter in due to the fact that his wife is eight months pregnant which prevents her from proving assistance with the manual labor attendant to moving their daughter into her dormitory. They are planning to leave on Friday morning August 26th and return home on Sunday August 28th., They will be staying at the La Quinta Inns and Suites located in Plattsburgh. Mr. Colandra will provide his full itinerary to his supervising pre-trial service officer and of course immediately report his return to his residence. I contacted Elizabeth Geddes the Assistant Untied States Attorney assigned to this matter and she takes no position regarding this application.

I thanks the Court for considering this application...

The application is

granted.

Respectfully submitted;

PAPA, DEPAOLA & BROUNSTEIN

/s/

By: STEVEN L. BROUNSTEIN

Ramon E. Reyes, Ur. J. S.M.J. Dated: 8/17/11

Brooklyn, New York